



# CALHOUN COUNTY

## Office of Community Development

Parks & Recreation – Planning – GIS – MSU Extension – Solid Waste

315 West Green Street, Marshall, Michigan 49068 – 269/781-0784

### NARRATIVE INFORMATION SHEET CALHOUN COUNTY FY2020 U.S. EPA BROWNFIELDS CLEANUP GRANT APPLICATION

1. Applicant Identification:  
Calhoun County  
315 West Green Street  
Marshall, Michigan 49068
2. Funding Requested:
  - a) Cleanup Grant type: Single Site Cleanup
  - b) Federal Funds Requested: \$500,000, not requesting cost share waiver
  - c) Contamination: Hazardous Substances
3. Location: City of Battle Creek, Calhoun County, Michigan
4. Property information for site specific proposal: 161 East Michigan Avenue, Battle Creek, Michigan 49014
5. Contacts:
  - a) Project Director:  
Ms. Jennifer Bomba, Community Development Director, Calhoun County  
315 West Green Street, Marshall, Michigan 49068  
Phone: (269) 781-0817, E-mail: [jbomba@calhoucountymi.gov](mailto:jbomba@calhoucountymi.gov)
  - b) Chief Executive:  
Ms. Kelli Scott, Administrator/Controller, Calhoun County  
315 West Green Street, Marshall, Michigan 49068  
Phone: (269) 781-0966, E-mail: [kdsconfig@calhoucountymi.gov](mailto:kdsconfig@calhoucountymi.gov)
6. Population: Calhoun County: 134,487; City of Battle Creek (the Site): 51,247 (*U.S. Census QuickFacts, November 22, 2019*)
7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured response is identified in the Narrative and substantiated in the attached documentation.	Page 3
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
The priority site(s) is in a federally designated flood plain.	Page 2

The redevelopment of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	
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8. Letter from State of Tribal Environmental Authority: Attached



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
LANSING



LIESL EICHLER CLARK  
DIRECTOR

November 4, 2019

Ms. Jennifer Bomba  
Community Development Director  
Calhoun County  
315 West Green Street  
Marshall, Michigan 48068

Dear Ms. Bomba:

SUBJECT: Michigan Department of Environment, Great Lakes, and Energy (EGLE)  
Acknowledgment of a United States Environmental Protection Agency (US EPA)  
Brownfield Cleanup Grant Proposal for 2020

Thank you for your notice and request for a letter of acknowledgment for Calhoun County's proposal to the US EPA Brownfield Grant Program. EGLE's Remediation and Redevelopment Division (RRD), encourages and supports the County's redevelopment effort for the property at 161 East Michigan Avenue in Battle Creek. The RRD recognizes Calhoun County's success in utilizing their previous brownfield grants and need for cleanup funding at this site.

Calhoun County is applying for a \$500,000 hazardous substances cleanup grant which will be used to conduct remediation activities at the East Michigan Avenue property and facilitate redevelopment. As a general purpose unit of local government, Calhoun County is an eligible grant applicant.

Should the US EPA award a brownfield grant to Calhoun County, it would allow for redevelopment and reuse of this underutilized and contaminated property, improving the economic development and environmental conditions in the county. If you need further information or assistance regarding specific brownfield sites, or any of EGLE's brownfield programs, please feel free to contact me at the number below or by email at [SmedleyR@Michigan.gov](mailto:SmedleyR@Michigan.gov).

Sincerely,

Ronald L. Smedley  
Brownfield Redevelopment Coordinator  
Remediation and Redevelopment Division  
517-284-5153

cc: Mr. Matt Didier, US EPA Region 5  
Mr. Davin Ojala, SME

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**1. Project Area Description and Plans for Revitalization**

**a. Target Area and Brownfields**

**i. Background and Description of Target Area:** The target area for this grant is located in the City of Battle, which is the largest city in Calhoun County (County). Battle Creek, known as Cereal City, is located in the southern portion of Lower Michigan, approximately half-way between Chicago and Detroit. The City began developing in the late 1800s when railroads allowed manufacturing companies to ship their industrial and agricultural products all over the country. Around this time, Dr. Kellogg developed a ready-to-eat breakfast food made of baked wheat kernels. A few years later, a former patient C.W. Post developed Grape Nuts cereal. The idea caught on, inspiring a “cereal boom” and a subsequent manufacturing boom in the City. In the past 20 years, Battle Creek’s economy has been hit hard by the decline in domestic automobile production and the out-sourcing of manufacturing jobs. A 2019 Housing and Community Development Ecosystem Assessment identifies Battle Creek as a small “legacy city”. These legacy cities are cities across the rust belt and New England states that once had thriving manufacturing-based economies that created good job opportunities, a solid middle-class lifestyle, and vibrant communities. These legacy cities have subsequently struggled with poverty, neighborhood disinvestment, and a labor force that does not match employer needs. Battle Creek with help from the County and various economic development groups has focused on revitalizing its downtown core. A component of this revitalization is addressing the entry corridor sites that serve to connect the urban core to the surrounding neighborhoods and act to bring visitors and residents into the downtown. The County intends to focus cleanup grant funds on a site located in the **Elm Street Gateway** target area. This 0.15 square-mile area is located on the southeast side of the downtown district along the main east-west road (Michigan Avenue) that runs through downtown Battle Creek. The target area is bordered by the Battle Creek River and includes government buildings and an impoverished/minority residential neighborhood bordered by light industrial operations.

**ii. Description of the Brownfield Site:** The targeted site (Site) is the vacant southeastern portion of the parcel that includes the Calhoun County’s Justice Center. It is located near the intersection of Elm Street and East Michigan Avenue and encompasses approximately 2 acres. It is known as “The Mound” because it is currently covered with an approximately 50-foot by 350-foot mound that is an average of 15 feet in height. The Site was developed by 1919 with rail lines and a “gateman tower” associated with an adjoining railyard/roundhouse. During this time period, the adjoining sites were developed with a lumber/coal yard, automotive parts manufacturing operation, and a bulk oil storage site. The rail lines remained on the Site until the late 1980s/early 1990s, when the Site became vacant. Between 1993 and 1994 during construction of the Calhoun County Justice Center, soil was moved from the area of the justice center and piled on the Site in a mound. The Site has remained vacant land as the mound has prevented any type of site use or redevelopment. The known impact at the Site is likely associated with the historical on-site operations and the placement of the impacted mound materials on the Site. It has also likely been impacted by historical operations on adjoining sites. The soil mound on the Site consists of an upper layer of topsoil that is underlain by sand fill with debris (concrete, brick, railroad ties, etc.). The fill material in the soil mound is impacted with cis-1,2-dichloroethene, trichloroethene, naphthalene, arsenic copper, lead, mercury, selenium, silver, and zinc. The soil present directly below the soil mound is also impacted with many of the same constituents. Groundwater on the Site is impacted with cis-1,2-dichloroethene, trichloroethene, and vinyl chloride.

**b. Revitalization of the Target Area:** The City of Battle Creek has been working with the County, local economic development agencies, and the public to understand the needs of downtown Battle Creek and how they can best revitalize the area. They conducted interviews with local business owners and residents, held design workshops, completed a market analysis, and analyzed extensive data on existing conditions. Those involved noted that the “impression of emptiness” in and around the downtown core was keeping residents and visitors from patronizing the area. This process and the outcomes/goals are summarized in the 2017 Battle Creek Master Plan and the subsequent 2018 Downtown Plan, which include similar goals of promoting investment in the city core and elevating the downtown area as a community focal point and a premier place to work, live, play,

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and invest. In fact, these two plans both identify the target area as a gateway to downtown and the area of the **Site** as the key area that must be revitalized to attract people back into downtown.

**i. Reuse Strategy and Alignment with Revitalization Plans:** The County's projected redevelopment for the **Site** is a light-industrial operation expansion with surrounding green space that ties into the existing trail/linear park along the Battle Creek River. Removal of the mound will allow an existing state-of-the-art precision sheet metal fabrication company to construct an additional modern light-industrial building, add new jobs, create attractive and sustainable green space around their campus, and beautify their footage along East Michigan Avenue. This proposed redevelopment aligns directly with the Land Use Plan included in the 2017 Battle Creek Master Plan that identifies the **Site** and surrounding area as a production and employment center and neighborhood commercial area. The public and the project partners were involved in the development of the Downtown Plan and the identification of the area of the **Site** as a key downtown gateway. These interested parties also identified investment the city core as the first goal in the 2019 Battle Creek Master Plan. The redevelopment of this site directly supports the goals of both the 2019 Battle Creek Master Plan and the 2018 Downtown Plan.

The northernmost portion of the **Site** is in a special flood hazard area (Zone AE) and the remainder of the **Site** is in a Zone X flood area (0.2% annual chance flood hazard). The redevelopment plan includes inclusion of greenspace around the expanded light industrial operation. This will create on-site natural areas for stormwater infiltration and retention, which aligns with the Green Infrastructure goals of the 2019 Battle Creek Master Plan (i.e., reduce stormwater runoff and protect water quality in the Battle Creek River). This area will also act as a buffer during Battle Creek River flooding events and help protect structures on the **Site** and adjoining properties.

**ii. Outcomes and Benefits of Reuse Strategy:** The mound has prevented the expansion of the nearby metal fabrication company, and kept this key downtown gateway from being revitalized. The **Site** is located in the heart of an impoverished neighborhood that has seen declining property values for the last 20 years and has been contributing to the general disinvestment in the target area. Following cleanup of the **Site**, the metal fabrication company intends to expand their operations in multiple phases. This expansion will include an investment of approximately \$5,000,000, which is expected to generate over \$100,000 in annual tax revenue. The expansion will also provide needed employment opportunities for residents by creating construction jobs and 30 new skilled labor jobs with average wages of \$32/hour. It is expected that once this visible corner is redeveloped, it will spur additional interest in and redevelopment/renovation of additional nonresidential properties located in the **Elm Street Gateway** target area. The improvement of this unsightly property will also spur additional investment in the nearby residential neighborhood. The redevelopment will also facilitate the creation of green space areas south of the Battle Creek River, which will be connected to the existing Battle Creek Linear Park system.

The **Site** is located in a New Market Tax Credit (NMTC) Qualified Area. This allows investors to receive a tax credit against their federal income tax in exchange for making investments in Community Development Entities (CDEs), who in turn make loans and investments to businesses operating in this impoverished community. The **Site** is located within 0.25 miles of two Opportunity Zones, which include portions of downtown Battle Creek. The redevelopment of the **Site** and the revitalization of the target area that it will spur will result in the improvement of this key downtown gateway area. This in turn will directly benefit the two nearby Opportunity Zones by helping draw residents, visitors, and businesses back into the urban core and spur further economic development in the Opportunity Zones.

**c. Strategy for Leveraging Resources**

**i. Resources Needed for Site Reuse:** The County has already leveraged \$19,500 of its own funds and \$10,500 from the area land bank authority's assessment grant to conduct additional assessment of the **Site** for cleanup planning. The County has identified the following additional resources that can be used to support remediation and redevelopment of the **Site**. The table identifies the source/type, the County's eligibility for the funding, the funding in general and the use on the **Site**.



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<b>Funding Source</b>	<b>Description</b>	<b>Eligibility</b>	<b>Funding Use</b>
Michigan Natural Resources Trust Fund (MNRTF)	Grants that support development and improvement of public outdoor recreation opportunities	Local units of government can apply	Support development of green space and trail areas connected to the existing linear park along the Battle Creek River, just north of the <b>Site</b> .
Michigan Department of Transportation (MDOT) Category A	Funding for transportation projects that encourage economic development; requires 20% match	Calhoun County Road Department can apply	Support East Michigan Avenue improvements to increase access to the <b>Site</b> and improve streetscape.

The cleanup grant will stimulate the availability of these additional funds by supporting cleanup of the **Site**, which must be done before redevelopment can begin and the activities that will be funded by the MNRTF and MDOT sources can be completed. In addition to funds that the County is eligible to secure, there are resources that can be accessed by the **Site** developer and used for cleanup and redevelopment activities. These include:

- Industrial Facilities Tax Exemption that provides the developer a tax break from real and/or personal property taxes for a period of 1-12 years.
- Battle Creek Brownfield Redevelopment Authority (BCBRA)\* Tax Increment Financing that provides reimbursement of eligible cleanup and redevelopment costs including soil removal and disposal, construction of exposure barriers, and site preparation.
- Battle Creek Unlimited (BCU)\* funds provided to businesses that create jobs.

\*BCBRA and BCU funding sources considered key funding sources; commitment letters included in Attachment 2.

**ii. Use of Existing Infrastructure:** The **Elm Street Gateway** target area and the **Site** have been developed since the early 1900s, and contain the required public infrastructure (water, sewer, electricity, etc.) to support the planned redevelopment. Furthermore, the **Site** and surrounding area have a long history of commercial and industrial use, so the existing infrastructure (including roads and rails for access/transportation and high-speed fiber/other telecommunication) extends to the **Site** and will support the revitalization plans discussed in Section 1.b.i. By directing grant funds to the **Site**, the County will be able to facilitate the use of this existing infrastructure. No infrastructure improvements are anticipated to be needed to support the proposed redevelopment.

## **2. Community Need and Community Engagement**

### **a. Community Need**

**i. The Community's Need for Funding:** Property tax and income tax revenues are the main sources of income for the County and the City of Battle Creek, and these revenues are not keeping up with inflation or municipal expenses. For the City of Battle Creek, the total property tax revenue has only increased by 6% since 2008, while cumulative inflation through that time period is estimated to be 16.6%<sup>1</sup> and total municipal expenses have increased by 19%. This means that the City of Battle Creek is struggling to maintain its budget and is losing money from its net position (capital assets minus related debt) each year. For the County, total property tax revenue decreased by nearly 5% from 2010 through 2018, without accounting for inflation. This means the County is also struggling to maintain their budget. On the income tax front for the County and the City of Battle Creek, the 2008-2009 recession came after decades of downsizing and closing of industrial employers (4,769 jobs have been lost throughout the County since 2003, with nearly half of those jobs being in the manufacturing sector<sup>2</sup>). Manufacturing jobs still account for approximately 24 - 25% of the jobs in the County and the City<sup>3</sup>; however, the median income in the County (when

<sup>1</sup> US Inflation Calculator

<sup>2</sup> Upjohn Institute, Southcentral Michigan Five-Year Comprehensive Economic Development Strategy: Final Report, 2014

<sup>3</sup> 2013-2017 American Community Survey

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adjusted for inflation) is still only 92% of 2008 wages<sup>4</sup>. This means that income tax revenues are also not keeping up with inflation rates and are not making up for losses in other revenue streams. Research conducted to support the 2019 Battle Creek Master Plan predicts continued population decrease through at least 2020, which will likely mean a further decrease in income tax revenue. This decrease in available property and income tax revenue has impacted the County and the City of Battle Creek's operating budgets. This means that though the both entities are solvent, they have very limited funds to available to support brownfields remediation and redevelopment. This grant will meet this need for remediation funding.

**ii. Threats to Sensitive Populations:** The **Site** is not the only known/suspected brownfield within the **Elm Street Gateway** target area. The nearby/adjoining properties were historically developed for industrial activities (historical lumber/coal yard, automotive parts manufacturing, and bulk oil storage operations) and other chemical intensive commercial operations (gasoline filling stations, auto repair, etc.). The majority of these brownfields are known to have impacted soil, groundwater, and likely soil gas with volatile organic compounds (VOCs) (including chlorinated-VOCs), polycyclic aromatic hydrocarbons (PAHs), metals, and/or polychlorinated biphenyls (PCBs).

**(1) Health and Welfare:** The largest health and welfare concerns are the ongoing disinvestment in the target area and uncontrolled exposures to contaminated soil, groundwater, and soil gas. The southern half of this target area is an impoverished and minority filled residential neighborhood. The residents that remain (the population in the target area decreased by 21.5% between 2000 and 2017<sup>3,5</sup> and vacancy rates have reached almost 50%<sup>3</sup>) are those minority and impoverished groups that cannot afford to leave. The percentage of minorities in the target area is 45.2%, which is much higher than the City's minority percentage of 28.6%<sup>3</sup>. The target area also has high numbers of children (25.1% below the age of 19) and women of child-bearing age (18.3% between the ages of 20 and 44)<sup>3</sup>. These residents are also economically disadvantaged. The poverty rate in the target area is 32.3%, which is substantially higher than the Michigan rate of 21.7% and over two times greater than the U.S. rate of 14.6%<sup>3</sup>. In the target area, 29.1% of the population receives public assistance and the median household and per capita incomes (\$35,417 and \$14,394) are nearly half that of the U.S. (\$57,652 and \$31,177)<sup>3</sup>. The impoverished and sensitive populations in the target area bear the disproportionate impact of the numerous brownfields in this small target area.

Brownfields threats to the health and welfare of the sensitive populations that live near the **Site** will be reduced by removal of the impacted mound material and development of the resulting area with a modern operation that incorporates engineering and/or institutional controls to further limit exposures. In addition to improving the health of residents (see (2) below), the redevelopment of the **Site** will reduce blight, thereby reducing the negative perception of the target area. This will draw residents and businesses back into this gateway target area, triggering additional redevelopment that will improve the health and welfare of the target area. This will help reverse the "impression of emptiness" around the downtown core. Reinvestment in the **Site** and other properties in the target area will increase the value of the land and buildings and improve the tax base. This will benefit residents and the County and City of Battle Creek, which depend on tax revenues to operate. The redevelopment of the **Site** with light-industrial operations will also create new jobs, providing employment opportunities for those who are unemployed/underemployed.

**(2) Incidence of Disease:** The **Site** and other brownfields in the target area are in close proximity to sensitive populations. Each of these former operations and the associated brownfields are negatively impacting residents, especially sensitive populations (impoverished residents, minorities, women, and children) by potentially exposing them to numerous contaminants via direct contact, ingestion, airborne particulate inhalation, and vapor intrusion pathways. The contaminants found on the **Site** (trichloroethene, cis- and trans-1,2-dichloroethene, vinyl chloride, naphthalene, arsenic, copper, lead, mercury, selenium, and zinc) and other target area brownfields are known to cause cancer and respiratory problems. Exposures to the contaminants from the **Site**

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<sup>4</sup> 2013-2017 American Community Survey, 2006-2008 American Community Survey, US Inflation Calculator

<sup>5</sup> 2000 U.S Census

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and other brownfields in the target area have likely resulted in lower life expectancy and elevated cancer, asthma, and chronic lower respiratory disease in the County (see following table; city/target area statistics are presented when available) when compared to both Michigan and the U.S. In addition, research has found that exposure to air pollutants is linked to higher infant mortality and other poor birth outcomes<sup>6</sup>, illustrating additional adverse health impacts for women and children (sensitive populations). Between 2008 and 2011, the Calhoun County Health

	U.S	Michigan	Calhoun County
Life Expectancy	79.1 <sup>7</sup>	78.1 <sup>8</sup>	75.8 (target area 74.9) <sup>8</sup>
Cancer Mortality Rate*	161 <sup>9</sup>	170.4 <sup>9</sup>	186.7 (white – 186.4; AA – 204.9) <sup>9</sup>
Adult Current/Lifetime Asthma Prevalence	9.3% <sup>10</sup> /13.3% <sup>11</sup>	10.9%/15.9% <sup>12</sup>	11.5%/16.3% <sup>10</sup>
Chronic Lower Respiratory Disease Death Rate*	40.5 (2016) <sup>13</sup>	57.1 (2017) <sup>13</sup>	76 (2017) <sup>13</sup>
Infant Mortality Rate**	4.9 <sup>13</sup>	6.8 <sup>13</sup>	9.8 (white – 6.2; AA -12.6) Battle Creek 13.4 <sup>13</sup>

\* rates per 100,000; \*\* rates per 1,000 live births; AA – African American

Department identified clusters of high rates of poor birth outcomes in the target area<sup>14</sup>. The minority (African American) and impoverished residents in the target area are disproportionately impacted. As shown in the table, cancer mortality and infant mortality rates are substantially higher for African Americans. In addition, it has been found that adults and children living in low income areas are hospitalized for asthma 2.9 to 4.2 times more often than their counterparts who live in higher income areas, and African American children and adults are hospitalized for asthma more than three times more often than white children and adults<sup>15</sup>.

Potential exposures to the material in the mound and other contamination on the Site will be reduced by removing the soil mound and/or putting engineering exposure controls in place as part of the planned redevelopment. The remediation and redevelopment of the **Site** will reduce target area populations' exposures to contaminated soil and groundwater and limit migration of contaminated groundwater and soil gas onto nearby sites. As the exposures to brownfield contaminants on the **Site** are reduced, this will reduce the cumulative environmental exposure risks to residents/sensitive populations in the target area and lead to a reduction in cancer, respiratory disease, and infant mortality rates and ideally improve life expectancy in the target area.

**(3) Disproportionately Impacted Populations:** As discussed above, health and welfare impacts from brownfields (including the **Site**) are greater for the sensitive populations (impoverished and minority residents, women, and children) who live near the brownfields in the target area. These residents continue to live in the target area because they cannot afford to leave. The target area has also been generally “left alone” by the government agencies, and it wasn’t until recently that efforts and funds have begun to be pushed into this struggling neighborhood. This illustrates the disproportionate cumulative impact of industrial operations and their subsequent brownfields and represents an ongoing environmental justice concern for target area residents. The U.S. EPA’s Environmental Justice Screening and Mapping Tool (EJSCREEN) rates for the target area as worse

<sup>6</sup> University of Michigan Environmental Health Policy Brief, Infant Mortality and Air Pollution, April 2014

<sup>7</sup> County Health Rankings, 2015-2017

<sup>8</sup> US Small-area Life Expectancy Estimates Project, 2010-2015

<sup>9</sup> National Cancer Institute, State Cancer Profiles, 2012-2016

<sup>10</sup> Michigan BRFSS Surveillance Brief, December 2018

<sup>11</sup> CDC, 2017 National Health Interview Survey Data

<sup>12</sup> Michigan Asthma Atlas, February 2019

<sup>13</sup> Michigan Department of Community Health, 2017; US data for 2016.

<sup>14</sup> The Health Data Research, Analysis and Mapping Center, Calhoun County

<sup>15</sup> Disparities in Michigan’s Asthma Burden, 2016



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than 77% to 95% of the country with respect to environmental indicators (air quality parameters, lead paint exposure, traffic proximity, proximity to superfund sites, etc.). The sensitive populations in the target area are facing a disproportionate share of the negative environmental impacts associated with historical commercial/industrial operations. This has been exacerbated by limited governmental support/funds, which can be tied directly to the difficult economic conditions the County and the City of Battle Creek have been facing for the past 20 years.

The exposure threats associated with the **Site** are known, and the grant-funded cleanup and subsequent redevelopment of the **Site** will reduce the sensitive populations exposures by removing one source of contamination from the target area. This will reduce their cumulative exposure risks and help lessen the disproportionate environmental impact historic industrial and commercial operations have had on these sensitive populations.

**b. Community Engagement**

***i. and ii. Project Partners and Project Partner Roles:***

<b>Partner Name</b>	<b>Point of Contact</b>	<b>Description</b>
Battle Creek Unlimited (BCU)	Shabaka Gibson, Vice President <a href="mailto:gibson@bcunlimited.org">gibson@bcunlimited.org</a>	Nonprofit corporation that serves as the business and economic development arm for Battle Creek. It provides business attraction, site selection, redevelopment assistance, business retention, and workforce research assistance.
<b>Role:</b> Provide redevelopment planning for <b>Site</b> and other properties in the target area and help and assist with acquiring additional funds to support remediation and redevelopment the <b>Site</b> .		
Battle Creek Area Chamber of Commerce	Kara Beer, President 269-962-4076 <a href="mailto:kbeer@battlecreek.org">kbeer@battlecreek.org</a>	Business organization that works to connect businesses with the community and the opportunities within the community. The Chamber also provides access to various business training/education programs.
<b>Role:</b> Support redevelopment planning at the <b>Site</b> and work with local businesses to spur ancillary development in target area.		
Community Action	Michelle Williamson, Chief Executive Officer 269-441-1616 <a href="mailto:michellew@caascsm.org">michellew@caascsm.org</a>	Nonprofit that promotes economic and social opportunities to help impoverished residents achieve and maintain independence. Their main office is located in the target area and they are actively involved in working to improve health and welfare in this neighborhood.
<b>Role:</b> Coordinate/facilitate public meetings and solicit input and work with target area residents to tie redevelopment of the <b>Site</b> into overall plans for the target area.		

**iii. Incorporating Community Input:** Upon grant award, a press release will be issued in the local newspaper and posted on the County and City of Battle Creek's websites and Facebook and Twitter accounts, which are interactive internet forums that update the community in real time. Key partners (see Section 2b.i) will be notified and given information to distribute and place on their websites. News releases, web postings, and written materials will include a notice that Spanish-language versions are available and that translators will be available for public meetings, allowing Hispanic residents in the City of Battle Creek (6.5%) and the target areas (3.4%) to participate in the public process<sup>3</sup>. Specific stakeholders, such as residents adjacent to the Site and those within the target area, may also receive information via mail, phone, or email.

The County will host an initial public kick-off meeting to acquaint the community with the project, and will ask the public to identify concerns they may have with the cleanup project and associated logistics. This step is imperative to ensure that the public's concerns are heard and incorporated into the project. At this meeting, the County will reiterate the availability of their website and Facebook and Twitter pages, which will allow the community to interact with the County in real time. The County will communicate progress of the cleanup activities through public meetings at major project milestones, including: 1) cleanup planning/approach selection; 2) cleanup

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completion; and 3) redevelopment planning. Public meetings will be held at readily identifiable and accessible public buildings in, or as close as possible to, the target area to receive and discuss stakeholder comments. Summaries of the meetings will be placed on the County and City of Battle Creek's websites and Facebook page so those that could not attend meetings can follow the project progress and provide comment if desired. The combination of public meetings, social media, and written information will allow for information sharing and give resident/citizen groups a way to voice their concerns for the project. Once cleanup activities are initiated, project updates will be provided at the public County Board of Commissioners meetings and the primary information flow will be outward to the community, notifying stakeholders about cleanup and **Site** redevelopment progress, and summarizing the continual reduction of health and environmental impacts. At the close of the project, the County will hold a final public meeting to notify the community of the outcomes of the project. All presentation materials used throughout the project will be archived and hard copies will be available upon request.

**3. Task Descriptions, Cost Estimates, and Measuring Progress**

**a. Proposed Cleanup Plan:** The cleanup plan includes removal and disposal of the impacted soil mound materials and, if needed, placement of a layer of clean fill material on the ground surface in the area of the former mound. First, the **Site** will be secured with fencing to limit access to the area while cleanup activities are underway. The trees and brush on the mound will be cleared and disposed off-site. The remediation contractor will then deconstruct the mound. The material must be taken to a licensed landfill per Michigan's environmental remediation program<sup>16</sup> that requires that excess soil impacted at levels above residential cleanup levels be disposed at a licensed facility. Prior to hauling the material the licensed landfill, waste characterization samples will be collected and submitted for analysis as requested by the landfill. Once the landfill approves the material, hauling will begin. Following removal of the mound, soil verification samples will be collected from the resulting ground surface to determine if impact remains. The number of samples to be collected will be determined using Michigan's statistical guidance. Based on the results of this sampling, the area will either be graded for redevelopment or will be covered with a layer of imported clean fill material to prevent contact with remaining impacted soil until redevelopment.

**b. Description of Tasks/Activities and Outputs**

<b>Task 1 Programmatic and Outreach</b>
<p><b>i. Project Implementation:</b></p> <ul style="list-style-type: none"><li>• Work Plan will be prepared.</li><li>• Cooperative Agreement (CA) will be executed.</li><li>• A Qualified Environmental Professional(s) (QEP) will be retained in compliance with applicable federal procurement regulations.</li><li>• Quarterly reports will be submitted to the U.S. EPA; the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) will be updated; and final project closeout documentation will be submitted.</li><li>• A project kick-off meeting will be hosted by the County.</li><li>• Additional project milestone [(1) <i>cleanup planning/approach selection</i>; (2) <i>cleanup completion</i>; (3) <i>redevelopment planning</i>] meetings will be hosted by the County.</li><li>• Ongoing outreach activities including notifying the impacted residents about cleanup and redevelopment progress will be conducted.</li></ul> <p>Task includes in-kind County staff time for website, Facebook, and Twitter updates; document preparation; and travel for amounts over those accounted for in 3.c.</p>
<p><b>ii. Anticipated Schedule:</b></p> <ul style="list-style-type: none"><li>• Work Plan will be prepared within 1 month of receiving notification of the grant award.</li><li>• CA will be executed within 3 months of award.</li><li>• QEP will be retained within 3 months of award.</li></ul>

<sup>16</sup> Part 201 of the Michigan Natural Resources and Environmental Protection Act (NREPA), Public Act 451 of 1994, as amended (Part 201).

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<ul style="list-style-type: none"> <li>Quarterly reports will be submitted within 30 days of the end of the quarterly reporting period and ACRES will be updated. ACRES will be updated with redevelopment information during and/or after the project. Final project closeout documentation will be submitted as required once the performance period ends.</li> <li>A project “kick-off” meeting will be held within 1 month of notification of grant award.</li> <li>Additional project milestone meetings will be held at the start of each milestone.</li> <li>Community outreach activities will continue throughout the performance period.</li> </ul>
<b>iii. Task/Activity Lead:</b> The County, with support from the QEP, will lead the day-to-day programmatic oversight and outreach.
<b>iv. Outputs:</b> Work Plan, CA, quarterly reports (12); ACRES updates; final project closeout documentation; at least four public meetings; updated websites; and outreach materials.
<b>Task 2 Cleanup Planning</b>
<b>i. Project Implementation:</b> <ul style="list-style-type: none"> <li>Quality Assurance Project Plan (QAPP) will be prepared.</li> <li>Analysis of Brownfields Cleanup Alternatives (ABCA) documents will be finalized, community involvement plan (CIP) completed, and an administrative record established.</li> <li>Remediation Work Plan will be prepared for Michigan Department of Environment, Great Lakes, and Energy (EGLE) review and approval.</li> <li>Bid plans and specifications for the cleanup will be prepared for remediation contractor selection. Bids will be solicited and the lowest-cost, qualified contractor will be retained.</li> </ul>
<b>ii. Anticipated Schedule:</b> <ul style="list-style-type: none"> <li>QAPP submitted to the U.S. EPA for review and approval, finalized ABCA documents completed, and administrative record established within 3 months of selection of the QEP.</li> <li>Remediation Work Plan submitted to EGLE within 3 months of selection of the QEP.</li> <li>Bid plans and specifications prepared and remediation contractor selected within 2 months of EGLE approval of Remediation Work Plan.</li> </ul>
<b>iii. Task/Activity Lead:</b> The QEP will lead the cleanup planning and oversight activities.
<b>iv. Outputs:</b> One QAPP, one set of final ABCA documents, one CIP, administrative records compiled and available (document repository), one Remediation Work Plan, one set of bid plans and specifications, and selection of remediation contractor.
<b>Task 3 Soil Mound Removal</b>
<b>i. Project Implementation:</b> Trees/brush will be cleared and the mound deconstructed. Soil and associated debris will be transported for disposal at properly licensed facility. Clean off-site fill material may be placed. Costs associated with QEP monitoring removal activities for compliance with the Remediation Work Plan and applicable federal wage-rate policies and additional trucking costs will be paid with private funding or other state grants/loans.
<b>ii. Anticipated Schedule:</b> Soil mound removal activities will begin within 1 month of selection of the remediation contractor. Weather conditions may delay soil mound removal activities.
<b>iii. Task/Activity Lead:</b> The QEP will lead the task and the selected remediation contractor will complete the soil mound removal activities.
<b>iv. Outputs:</b> Removal of approximately 22,400 tons of impacted soil and debris, daily field notes documenting removal activities, and waste manifests.
<b>Task 4 Remediation Verification and Reporting</b>
<b>i. Project Implementation:</b> Following removal of the soil mound, remediation verification soil samples will be collected from the resulting ground surface. The frequency, spacing, and analysis parameters for the samples will be selected in accordance with published EGLE guidance for the Michigan Voluntary Cleanup Program (VCP). At the conclusion of the removal activities, the field activities, quantities of mound materials removed, and results of verification sampling will be documented in a cleanup completion report.
<b>ii. Anticipated Schedule:</b> Remediation verification samples will be collected immediately following completion of the soil mound removal activities. The cleanup completion report will be completed with two months of receipt of the results of the verification samples.

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<b>iii. Task/Activity Lead:</b> The QEP will lead the remediation verification and reporting task.
<b>iv. Outputs:</b> Cleanup completion report that documents “current” site conditions.

**c. Cost Estimates**

**Task 1: Programmatic and Outreach** includes personnel costs of \$2,000 (\$50/hour for 40 hours) for required reporting and outreach meetings, and contractual costs of \$5,000 for assistance on quarterly reports, maintaining ACRES, and community involvement outreach meetings.

**Task 2: Cleanup Planning** includes \$15,000 in contractual costs for completion of ABCA documents, CIP, document repository, Remediation Work Plan, and bid plans and specifications.

**Task 3: Cleanup** includes \$568,500 in contractual costs (\$468,500 in grant funds) for removal and disposal of the soil mound. This includes \$403,200 in soil disposal (22,400 tons at \$18/ton), \$150,000 in excavation and soil handling, and \$15,300 in trucking.

**Task 4: Remediation Verification and Reporting** includes contractual costs of \$4,500 for collection of soil remediation verification samples (up to 30 samples at \$150/sample) and \$5,000 for preparation of a cleanup completion report.

<b>Budget Categories*</b>		<b>Task - 1 Programmatic &amp; Outreach</b>	<b>Task - 2 Cleanup Planning</b>	<b>Task -3 Cleanup</b>	<b>Task 4 - Remediation Verification &amp; Reporting</b>	<b>Total Budget</b>
<b>Direct Costs</b>	Personnel	\$2,000				<b>\$2,000</b>
	Fringe Benefits					
	Travel					
	Equipment					
	Supplies					
	Contractual	\$5,000	\$15,000	\$468,500	\$9,500	<b>\$498,000</b>
	Other					
<b>Total Direct Costs</b>		<b>\$7,000</b>	<b>\$15,000</b>	<b>\$468,500</b>	<b>\$9,500</b>	<b>\$500,000</b>
<b>Total Federal Funding</b>		<b>\$7,000</b>	<b>\$15,000</b>	<b>\$468,500</b>	<b>\$9,500</b>	<b>\$500,000</b>
<b>Cost Share</b>				<b>\$100,000</b>		<b>\$100,000</b>
<b>Total Budget</b>		<b>\$7,000</b>	<b>\$15,000</b>	<b>\$568,500</b>	<b>\$9,500</b>	<b>\$600,000</b>

\* No indirect costs will be incurred.

**c. Measuring Environmental Results:** The County will track, measure, and report on the success of the project utilizing ACRES to track the following outputs: ABCAs and Remediation Work Plans completed, bid plans and specifications completed, and tons of soil removed and properly disposed. The actual outputs and their timing will be compared to the outputs and anticipated schedule listed in Section 3.b. The County will track, measure, and report the following outcomes in ACRES: acres of land remediated and redeveloped; acres of parks and greenspace preserved or created; number of jobs created or retained; tax revenue generated; redevelopment investment value; and other funding leveraged. The County will report outcomes/outputs that cannot be easily entered into ACRES (i.e., website updates and community outreach/meetings) in quarterly reports. The County will also evaluate the extent to which the cleanup activities and future redevelopment result in the protection of human health and the environment. The County will evaluate the project progress semi-annually against the goals and schedules in Section 3.b and, if goals are not being met or are off-schedule, meet with local stakeholders and the environmental consultant to discuss the shortcomings and adjust the project approach and schedule, as needed.

**4. Programmatic Capability and Past Performance**

**a. Programmatic Capability:**

**i. and ii. Organizational Structure and Description of Key Staff:** The County has experience managing grants and will use the same project team during the entire grant period. The project team includes the County’s Community Development Director (Ms. Jennifer Bomba), Community



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Development Program Manager (Mr. Doug Ferrall), Deputy Controller (Ms. Megan Banning), and an environmental consultant (see 4.a.iii). The project team will be led by Project Manager Ms. Bomba who has 20 years of community development, land use planning, and municipal financial management experience. Ms. Bomba will be responsible for all grant operations and management of the environmental consultant. Ms. Bomba has managed numerous federal and state grant projects throughout her career and has guided their timely and effective use. Ms. Bomba will ensure that this grant is successful and she and Ms. Banning will be responsible for establishing and managing the program's financial accounts and payment requests and transfers. Ms. Banning has over 4 years of experience in managing the financial portion of state and federal grants and is well-versed in the Automated Standard Application for Payments (ASAP) system. Mr. Ferrall will serve as assistant Project Manager. He will be involved in the daily grant operations and will become the Project Manager if Ms. Bomba leaves the County. This small and experienced project team will be able to quickly and effectively complete all administrative and financial requirements for the grant to ensure the project is successfully completed within the 3-year period.

**iii. *Acquiring Additional Resources:*** The County will retain an environmental consultant (QEP) to assist with Cleanup Grant activities and monitor the cleanup when it is conducted. The County has a procurement process in place and has procured contractors for state and federal grant projects, including assessment grants. The process complies with federal procurement regulations (40 CFR §31.36) and includes guidance to attract and utilize minority- and women-owned businesses, as possible. Within one month of securing the grant Cooperative Agreement, the County will prepare the project Request for Qualifications and will direct and oversee the procurement process and will select a consultant within three months of award. The selected consultant(s) will have managed U.S. EPA Cleanup Grant projects and be familiar with all programmatic requirements. The County will use the same process to procure a remediation contractor to complete the actual cleanup work.

**b. Past Performance and Accomplishments**

(i) The County was awarded a U.S. EPA Assessment Grant for Hazardous Substances (\$200,000) in FY2006, a U.S. EPA Assessment Grant for Petroleum (\$200,000) in FY2008, and a U.S. EPA Assessment Grant for Hazardous Substances (\$200,000) in FY2010.

**1. Accomplishments:** Using these grants, 32 sites were assessed resulting in the following outputs: 24 Phase I ESAs/Phase I ESA Updates, 14 Phase II ESAs (task includes hazardous materials assessments), and 16 Baseline Environmental Assessment Reports and 7 Due Care Plans were being prepared for the Michigan VCP. Using these grants, the County supported the following outcomes: assessment of over 100 acres of brownfields, creation of 23 permanent jobs, and leveraging of \$3,750. The grants' outputs and outcomes were reported in ACRES. The County acknowledges that they did not accurately or effectively track the leveraged dollars associated with the past grants because they did not understand the importance of this information for documenting the success and efficacy of the U.S. EPA brownfields program.

**2. Compliance with Grant Requirements:** The County developed Work Plans and successfully negotiated Cooperative Agreements (CAs) with the U.S. EPA. The County complied with the Work Plans and their associated schedules, terms, and conditions. The County submitted and received approval for project Quality Assurance Project Plans (QAPPs) and associated updates, complied with quarterly reporting and annual financial status reporting requirements, and submitted to the U.S. EPA, via the ACRES database, the site information and assessment data for each grant. As discussed below, the FY2006 and FY2010 hazardous substances grants were completed within the 3-year grant periods and the funds were expended as practical. The FY2008 petroleum grant was granted a one-year extensions and funds not spent were returned to U.S. EPA. The FY2006 and FY2010 Hazardous Substances Assessment Grant funds were expended within their respective three-year grant periods (\$2,914.99 and \$4,938.17 remained). Approximately \$8,333.19 remained in the FY2008 Petroleum Assessment Grant and was returned to the U.S. EPA.



**ATTACHMENT 1**  
**THRESHOLD CRITERIA RESPONSE**

**THRESHOLD CRITERIA**  
**CALHOUN COUNTY**  
**FY 2020 U.S. EPA BROWNFIELD CLEANUP GRANT APPLICATION**

**THRESHOLD CRITERIA**

1. **Applicant Eligibility:** Calhoun County is a General Purpose Unit of Local Government in the State of Michigan.
2. **Previously Awarded Cleanup Grants:** The Mound site (the Site) has not received funding from a previously awarded EPA Brownfields Cleanup Grant.
3. **Site Ownership:** Calhoun County is the sole owner of the Site. Calhoun County acquired the Site on April 2, 1996.
4. **Basic Site Information:** The Site is known as “The Mound”. It is the southeastern portion of a parcel identified as 161 East Michigan Avenue, Battle Creek, Michigan 49014.
5. **Status and History of Contamination at the Site:** The Site is contaminated with hazardous substances (see following paragraphs). The Site was developed by 1919 with rail lines and a “gateman tower” associated with an adjoining railyard/roundhouse and factory. Residences were also present on the southern portion of the site from at least 1919 through 1955. The rail lines remained on the Site until the late 1980s/early 1990s, when the Site became vacant land. Between 1993 and 1994 during construction of the west-adjointing Calhoun County Justice Center, soil was moved from various adjoining sites and piled on the Site in a mound. The Site is currently developed with an approximately 50-foot by 350-foot mound that is an average of 15 feet in height and is covered with trees.  
  
The environmental concerns at the site are: potential impact associated with onsite railroad line operations; potential migration of impact from historical lumber/coal yard operations on the north-adjointing site, Shay Motor Co. automotive parts manufacturing and McLeier Oil/Sinclair Refining Co. bulk oil storage operations on the east-adjointing sites, and gasoline filling station operations on the south-adjointing site; potential migration of impact from nearby contaminated sites located east, southeast, and south of the Site; and impact associated with the material in the berm on the Site. The known impact at the Site is likely associated with the historical on- and off-site operations as well as the placement of the impacted soil and associated fill materials on the Site. The soil mound on the Site consists of an upper layer of topsoil that is underlain by sand fill with debris (concrete, brick, railroad ties). The fill material in the soil mound is impacted with cis-1,2-dichloroethene, trichloroethene, naphthalene, arsenic, copper, lead, mercury, selenium, silver, and zinc. The soil present directly below the soil mound is also impacted with many of these same constituents. Groundwater on the Site is impacted with cis-1,2-dichloroethene, trichloroethene, and vinyl chloride.
6. **Brownfields Site Definition:** The Site meets the definition of a brownfield under CERCLA §104(k). The Site is not listed or proposed for listing on the National Priorities List; is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and is not subject to the jurisdiction, custody, or control of the United States government.

7. **Environmental Assessment Required for Clean Grant Applications:** The Site was first assessed in 2015. This limited assessment included the completion of four test pits through the mound and the collection of soil samples. This assessment identified the presence of trichloroethene and metals in the mound materials at concentrations above State of Michigan cleanup criteria. A second site assessment was completed in October 2019 and documented in a Phase II ESA report dated November 25, 2019. This assessment included the completion of six test pits through the soil mound, two soil borings near the base of the soil mound, and the collection of soil and groundwater samples. The results from these assessments are discussed in Item 5.
8. **Enforcement or Other Actions:** No ongoing or anticipated environmental enforcement actions or other actions related to the Site are known.
9. **Sites Requiring a Property-Specific Determination:** The Site does not require a Property-Specific Determination.
10. **Threshold Criteria Related to CERCLA/Petroleum Liability**
  - a. **Property Ownership - Hazardous Substances**
    - i. **Exemptions to CERCLA Liability**
      - (1) **Indian Tribes** – Not Applicable
      - (2) **Alaska Native Village Corporations and Alaska Native Regional Corporations** – Not Applicable
      - (3) **Property Acquired Under Certain Circumstances by Units of State and Local Government** – Not Applicable
    - ii. **Exemptions to Meeting the Requirements For Asserting an Affirmative Defense to CERCLA Liability**
      - (1) **Publicly Owned Brownfields Acquired Prior to January 11, 2002**
        - (a) The 161 East Michigan Avenue parcel, which includes the Site, was transferred from the City of Battle Creek’s Downtown Development Authority (DDA) to Calhoun County (a local unit of government) via Quitclaim Deed (a non-warranty deed used to transfer real property from a grantor to a grantee). The 161 East Michigan Avenue parcel was transferred from the DDA to Calhoun County to allow the County to construct the Calhoun County Justice Center on the portion of the Site that is not covered with the mound.
        - (b) The Site was transferred to Calhoun County April 2, 1996.
        - (c) The material in the onsite soil mound was moved onto the Site prior to the time when Calhoun County acquired the Site.
        - (d) Calhoun County has not caused or contributed to any release of hazardous substances at the Site. The Site had been developed with the mound prior to the County’s acquisition of the Site in 1996. The County has not moved materials into or out of the mound or disturbed the mound since acquiring the Site in 1996. The mound is fully covered with brush and trees.
        - (e) Calhoun County has not, at any time, arranged for the disposal of hazardous substances at the Site or transported hazardous substances to the Site.
    - iii. **Landowner Protections from CERCLA Liability** – Not Applicable
  11. **Cleanup Authority and Oversight Structure:**
    - a. **Cleanup Oversight** The Michigan Voluntary Cleanup Program (VCP) is designed for self-managed cleanups, with no formal “enrollment.” Therefore, Calhoun County will

ensure that cleanup of the site is consistent with the Michigan Part 201 VCP by enlisting the involvement of the Michigan Department of Environment, Great Lakes and Energy (EGLE) in cleanup decisions and retaining a qualified environmental consultant to design and oversee all environmental response actions. Calhoun County has been directly involved in assessment, cleanup, and redevelopment of multiple brownfields for over ten years, including utilizing multiple U.S. EPA Brownfields Assessment grants between 2006 and 2010. The County understands the strategies, systems, and procedures needed to manage the cleanup. The County will insist on, and rely upon its retained consultant to ensure compliance with the rules and published guidance for compliance with Michigan VCP requirements for remediation design, establishment of cleanup criteria for target contaminants, remediation verification, quality assurance/quality control, and reporting. The County will select a qualified environmental consultant using a qualifications-based competitive solicitation in accordance with applicable procurement regulations. The required qualifications will include experience in the following areas: designing environmental remediations using diverse technologies; developing remediation specifications and bid documents; identifying, evaluating, selecting and monitoring contractors; overseeing site remediation projects; complying with Michigan VCP rules and guidance; successful brownfields cleanup and redevelopment; and managing U.S. EPA brownfields grants. Consultant selection, including preparation and issuance of a Request for Qualifications, submissions review, candidate interviews, and consultant selection, will commence after completion of a Cooperative Agreement and will be completed prior to initiation of remedial design and specification activities. EGLE will be asked to review and comment on the site remediation approaches selection and remedial action plan to verify compliance with the Michigan VCP.

**b. Offsite Access:** An access road is present on the eastern portion of the Site that will allow vehicular access to the Site during cleanup. It is anticipated that the vacant land on the east-adjointing site may need to be used for equipment staging. The owner of this adjacent property is the developer who intends to redevelop/use the Site after cleanup activities are complete. The County will negotiate an access agreement with the owner prior to the start of cleanup activities.

12. **Community Notification:** An advertisement announcing Calhoun County's intent to apply for this Brownfield Cleanup Grant was published on November 14, 2019, in the Battle Creek Shopper News and the Advisor & Chronicle, the newspapers of record for the County's public announcements. A public meeting to discuss the draft proposal and associated draft Analysis of Brownfields Cleanup Alternatives (ABCA) and consider public comments was held on November 21, 2019, at the Calhoun County Board of Commissioners meeting. A copy of the draft ABCA, advertisement, meeting sign-in sheet, and meeting notes are attached. No public comments were received either before or during the November 21, 2019 public meeting.

### 13. Statutory Cost Share

**a. Cost Share:** The expected cost needed to cleanup the Site is expected to exceed the Cleanup Grant funds being requested. The County is applying for a Renew Michigan Loan (RML) to support the project and meet the County's cost share of \$100,000.

**b. Hardship Waiver:** Not Applicable

# **ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES (ABCA) FOR ENVIRONMENTAL RESPONSE ACTIONS**

## **US EPA BROWNFIELDS CLEANUP GRANT PROGRAM 161 EAST MICHIGAN AVENUE CITY OF BATTLE CREEK, CALHOUN COUNTY, MICHIGAN**

### **1.0 INTRODUCTION**

This Analysis of Brownfield Cleanup Alternatives documents Calhoun County's (the County's) evaluation of environmental response action alternatives considered to mitigate exposures to contaminated soil and groundwater present on a portion of the parcel identified as 161 E Michigan Avenue (the Site) in the City of Battle Creek, Calhoun County, Michigan. These response actions are needed to safely redevelop this brownfield as a commercial site.

The environmental response actions will be funded by a grant from the United States Environmental Protection Agency (U.S. EPA) Brownfields Cleanup Grant awarded to the County in XXXX. The U.S. EPA confirmed the eligibility of the Site and grantee on XXXX.

### **2.0 SITE BACKGROUND AND CONDITIONS**

#### **A. SITE LOCATION AND DESCRIPTION**

The Site is known as "The Mound" and is the southeastern portion of a parcel identified as 161 East Michigan Avenue. The remainder of the 161 East Michigan Avenue parcel is developed with the Calhoun County Justice Center and associated parking areas and landscaped grounds. The Site is located south of the Battle Creek River on the eastern edge of downtown Battle Creek. The Site encompasses approximately 2 acres of land and is developed with an approximately 50-foot by 350-foot mound with an average height of 15 feet. The mound is fully covered with mature trees. The Site location is shown on Figure 1, and the existing Site features are shown on Figure 2. The Site is adjoined by commercial sites and a City of Battle Creek Fire Department station. Shouldice Brothers (Shouldice), an industrial manufacturer and contractor (millwright, sheet metal fabrication, etc.), adjoins the Site to the northeast. The Site is owned by Calhoun County, and following cleanup activities, it will be sold to Shouldice for redevelopment.

#### **B. SITE HISTORY AND USES**

The Site was developed by 1919 with rail lines and a "gateman tower" associated with an adjoining railyard/roundhouse and factory (located on the 161 E Michigan Avenue parcel). Residences were also present on the southern portion of the Site from at least 1919 through 1955. The rail lines remained on the Site until the late 1980s/early 1990s, when the Site became vacant land. Between 1993 and 1994 during construction of the west-adjointing Calhoun County Justice Center, soil was moved from various adjoining sites and piled on the Site in a berm. The Site is currently covered with a wooded soil mound.



## C. SITE ENVIRONMENTAL CONDITIONS

The soil mound on the Site generally consists of an upper layer of topsoil that is underlain by sand fill with debris (concrete, brick, plastic, wood, and railroad ties). The fill material in the soil mound is impacted with volatile organic compounds, polynuclear aromatic hydrocarbons, and metals that are identified as hazardous substances under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Specifically, cis-1,2-dichloroethene, trichloroethene, naphthalene, arsenic, copper, mercury, selenium, silver, and zinc were measured in the soil mound fill material at concentrations above Michigan's Voluntary Cleanup Program's generic cleanup criteria. The soil present directly below the soil mound is also impacted with many of these same constituents. Groundwater on the Site is impacted with cis-1,2-dichloroethene, trichloroethene, and vinyl chloride at concentrations above Michigan's Voluntary Cleanup Program's generic cleanup criteria.

Environmental conditions on the Site were determined from information and data contained in the following documents:

- SME, *Phase I ESA, Parcels 2 and 3, 161 E Michigan Avenue, Battle Creek, Michigan*, February 11, 2015
- SME, *Phase II ESA, Southeast Portion of 161 E Michigan Avenue, Battle Creek, Michigan*, November 25, 2019.

These documents are available at the project repository located at the following location:

Office of Community Development  
Calhoun County Administration Building  
315 West Green Street  
Marshall, Michigan  
Telephone: (269) 781-0817  
Contact: Ms. Jennifer Bomba  
E-mail: [jbomba@calhouncounty.org](mailto:jbomba@calhouncounty.org)

## D. OBSERVED OR FORECASTED CLIMATE CHANGE RISKS IN THE SITE AREA

Based on a review of the U.S. EPA Checklist: How to Address Changing Climate Concerns in an ABCA and a review of the State Climate Summary for Michigan<sup>1</sup>, the potential future climate change risks relate to an increase in temperature, an increase in the frequency of extreme precipitation events, and an increase in summer droughts. Based on the location of the Site near the Battle Creek River, it is likely that extreme precipitation events that lead to flooding could pose the greatest risk to the selected environmental response action. Increases in temperature and increased summer droughts may pose a much lesser threat to the selected environmental response action based on the urban location of the Site and the proposed redevelopment of the Site with a light-industrial operation.

## E. PROJECT GOALS AND OBJECTIVES

Following completion of cleanup activities, Shouldice intends to purchase the Site from the County and begin expanding their current operations in multiple phases. This includes construction of a new light industrial building in the area of the soil mound. This expansion will include an investment of approximately \$5,000,000 and will also will provide much needed employment opportunities for residents by creating construction jobs and 30 new skilled labor jobs with average wages of \$32/hour.

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<sup>1</sup> Scenarios for the National Climate Assessment ([scenarios.globalchange.gov](https://scenarios.globalchange.gov))

Battle Creek with help from the County and various economic development groups has focused on revitalizing its downtown core neighborhoods. A component of this revitalization is addressing the key entry corridor sites that serve to connect the urban core to the surrounding neighborhoods and act to bring visitors and residents into the downtown. The area of Site has been identified as a key gateway to downtown Battle Creek. It is expected that once this visible corner is redeveloped, it will spur additional interest in and redevelopment/renovation of additional nonresidential properties located in the area. The improvement of this unsightly property will also spur additional investment in the nearby residential neighborhood as residents notice that the area is improving.

In order to safely redevelop the Site, the soil must be removed to reach a usable grade and the resulting surface must be covered with clean fill material to prevent dermal contact exposures with remaining impacted soil.

### **3.0 THREATS TO HUMAN HEALTH AND THE ENVIRONMENT**

The potential for human direct contact with impacted soil is the exposure pathway of concern. This exposure pathway will be addressed by removing the impacted soil mound and covering the remaining surface with a dermal contact barrier.

In addition to limiting potential human exposures, the response actions and subsequent redevelopment will remove a source of impact that could be leaching into groundwater and migrating toward the Battle Creek River. This will help protect this key natural feature.

## **4.0 APPLICABLE REGULATIONS AND CLEANUP STANDARDS**

### **A. CLEANUP OVERSIGHT ROLES AND RESPONSIBILITY**

The County will oversee the grant-funded activities. Regulatory oversight and technical assistance for the project will be provided by the Michigan Department of Environment, Great Lakes and Energy (EGLE). Generally, EGLE provides financial, technical, legal, and educational assistance, and works in partnership with the U.S. EPA and other Michigan agencies to assist communities in making productive use of their brownfield properties. For the Mound project, EGLE will review and approve a work plan that describes the response actions and proposed redevelopment project. This review and approval will serve as EGLE's involvement in the project. In addition, if applicable, EGLE may review and approve the permits (e.g., soil erosion and sediment control permit) required for working near waterways/floodplain areas. The response actions will be conducted in general accordance with applicable U.S. EPA, EGLE, and Occupational Safety and Health Administration (OSHA) rules and guidance.

### **B. CLEANUP STANDARDS**

Part 201 of the Michigan Natural Resources and Environmental Protection Act (NREPA), Public Act 451 of 1994, as amended (Part 201), defines the environmental remediation program for sites impacted with contaminated soil, sediment, groundwater, soil gas, and other environmental media within the State of Michigan. Cleanup standards for environmental response actions addressing contaminated soil on the Site will be as defined by Part 201. Part 201 describes selected approaches and cleanup standards for investigation and risk-based closure of contaminated or potentially contaminated sites in Michigan. Part 201 standards for nonresidential use will be used for this cleanup.

### **C. APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARS)**

The Mound project is a brownfield redevelopment that is consistent with the operational requirements of the *1996 Addendum 1: Brownfields Redevelopment* to the *Superfund Memorandum of Agreement* between the State of Michigan and the U.S. EPA Region 5. In addition to the statutes and rules

governing cleanup oversight and standards described above, the following ARARs have been identified for the project:

- Environmental response actions
  - Waste management
    - 40 CFR 261 – 265: Hazardous waste
    - NREPA, Part 111 Hazardous Waste Management
    - NREPA, Part 115 Solid Waste Management
  - Transportation of wastes
    - 40 CFR 262: Hazardous wastes (EPA)
    - 49 CFR 172: Hazardous materials (DOT)
  - Health and safety
    - 29 CFR 1910.120 (HAZWOPER)
- Storm water management
  - NREPA, Part 31 Water Resources Protection

## 5.0 ENVIRONMENTAL RESPONSE ACTION ALTERNATIVES

To support the redevelopment of the Site, response actions are necessary for protection of human health and the environment. The following response action alternatives were considered:

- **Alternative 1** – No environmental response actions are completed on the Site (the “no action” alternative), and the mound material remains and the Site cannot be redeveloped.
- **Alternative 2** - Fence the perimeter of the Site and prohibit public access to the Site to prevent human contact exposures.
- **Alternative 3** – Deconstruct the mound and screen the mound material to separate out topsoil, fill soil, and man-made debris. Dispose the man-made debris off-site and characterize the remaining topsoil and fill soil to determine if portions of the material are “clean” and can be safely reused on-site. Place the reusable portions of the soil mound on the Site and east adjoining site in 6-inch lifts to raise the ground surface elevation for future redevelopment.
- **Alternative 4** – Remove the entire soil mound (soil and debris) and dispose off-site to support grading the Site to a usable/functional grade. Install dermal contact barrier over the former mound area to prevent human contact exposures by future site occupants and visitors.

These response action alternatives were evaluated using the following criteria:

- *Effectiveness* – 1) the degree to which toxicity, mobility and volume of contamination is reduced, 2) the degree of protection for public health, safety and welfare and for the environment, and 3) the extent of adverse effects on public health, safety and welfare and on the environment during response action implementation.

- *Implementability* – 1) technical feasibility, 2) availability of needed technologies, materials, equipment, and services needed to conduct the response action, and 3) administrative and permitting feasibility; presence of endangered species or historical structures; technical feasibility of ancillary functions and issues, such as engineering controls, natural attenuation of contaminant concentrations, recycling of materials, and waste treatment or disposal; and project schedule.
- *Cost* – 1) direct and indirect capital, labor and services costs, including costs of design and testing and 2) annual operation and maintenance costs.
- *Impact of changing climate conditions* – impact identified climate change conditions and risk factors could have on effectiveness of the alternative.

## A. ALTERNATIVE 1 – NO-ACTION

The Site would remain a vacant, tree-covered mound. The County would maintain the topsoil and tree cover to verify that the mounds remains intact. The costs associated with Alternative 1 are summarized below:

RESPONSE ACTIVITY	UNIT COST	QUANTITY	COST
Mound inspection/repair	\$1,000/yr.	20	\$20,000
<b>TOTAL</b>			<b>\$20,000</b>

This alternative was evaluated against the three key criteria as follows:

- *Effectiveness* – Low: Current and future dermal contact risks are not mitigated or reduced.
- *Implementability* – High:
- *Cost* – Low.
- *Impact of changing climate conditions* – Medium: Increased intensity precipitation events could result in erosion of the mound and spread of impacted material. Increased temperature and summer droughts not likely to impact the efficacy of the alternative.

The no-action alternative is a low-cost and implementable alternative but it will provide no reduction/mitigation in the dermal contact risks present at the Site. In addition, the Site will remain underutilized and this key downtown gateway will not be improved.

## B. ALTERNATIVE 2 - FENCE THE PERIMETER OF THE SITE AND PROHIBIT PUBLIC USE

Access to the Site would be prevented by the installation of secure fencing (eight-foot high, chain link or ornamental metal design fence, with gates secured by padlocks). An operations and maintenance (O&M) program would be implemented to maintain the integrity and effectiveness of the public access barrier. The O&M program would consist of (1) regular maintenance of the surface vegetation in the fenced area to limit dust and soil erosion and (2) an inspection and repair program for the fence to identify deficiencies in the fence that compromise its integrity or effectiveness as an access barrier, and repairing the deficiencies quickly and effectively. Due care procedures including controlled employee access, development of low impact/disturbance maintenance procedures, and maintenance of surface vegetation, would be designed and implemented to protect the health of persons employed or contracted to

implement the O&M program for the Site. Land use restrictions on the Site would be filed as a restrictive covenant on the Site deed.

The costs associated with Alternative 2 are summarized below:

RESPONSE ACTIVITY	UNIT COST	QUANTITY	COST
Engineering design	\$15,000 lump sum	1	\$15,000
Construction of chain link perimeter fence	\$30/lf	1,500	\$45,000
O&M and site inspections	\$5,000 (year 1) \$2,500/year (years 2 -10)	10	\$27,500
<b>TOTAL</b>			<b>\$87,500</b>

This alternative was evaluated against the three key criteria as follows:

- *Effectiveness* – High: Current and future dermal contact risks will be mitigated.
- *Implementability* – High: The Site can be fenced.
- *Cost* – Low.
- *Impact of changing climate conditions* – Medium: Increased intensity precipitation events could result in erosion of the mound and spread of impacted material (fencing will not prevent this). Increased temperature and summer droughts not likely to impact the efficacy of the alternative.

Fencing the perimeter of the Site would be an effective alternative that could be implemented using readily available techniques and technologies. Human dermal contact exposures to near-surface soil would be mitigated by restricting public access to the area and by implementing due care procedures to protect maintenance workers. Although this alternative is technically and economically feasible, it would not achieve the project objectives of redeveloping the Site and creating a more vibrant entry into Battle Creek. It would also ensure that this key Site remains underutilized.

### C. ALTERNATIVE 3 – DECONSTRUCT THE MOUND AND SCREEN THE MOUND MATERIAL TO SEPARATE OUT TOPSOIL, FILL SOIL, AND MAN-MADE DEBRIS

The soil mound would be deconstructed and the topsoil, fill soil, and man-made debris would be separated. The man-made debris would be disposed off-site. The remaining topsoil and fill soil would be characterized using EGLE statistical guidelines in an attempt to determine if portions of the material in the mound could be safely reused (i.e., constituents not present at concentrations above Part 201 nonresidential use cleanup criteria). Material found to unsuitable for reuse (i.e., impacted) would be disposed off-site. Material found to safe for reuse would be placed back on the Site and graded to provide a raised ground surface elevation suitable for redevelopment. For budgeting purposes, it is assumed that approximately 7,000 yards (9,800 tons) of material will be reusable and the remaining 12,600 tons will be disposed off-site. Based on this quantity of reusable soil, the Site and east adjoining site (approximately 100,000 square feet in area) would be raised approximately 2 feet.

The costs associated with Alternative 3 are summarized below:



RESPONSE ACTIVITY	UNIT COST	QUANTITY	COST
Secure site during response actions (both Site and adjoining areas for material storage)	\$35,000 lump sum	1	\$35,000
Material characterization and segregation of man-made debris, material safe for reuse, and material not safe for reuse	\$80,000 lump sum	1	\$80,000
Screening, excavation, transportation and disposal of man-made debris and material not safe for reuse	\$35/ton	12,600	\$441,000
Waste characterization and monitoring	\$30,000 lump sum	1	\$30,000
Transport, placement, and compaction of material safe for reuse	\$15/ton	9,800	\$147,000
Compaction testing	\$10,000 lump sum	1	\$10,000
<b>TOTAL</b>			<b>\$743,000</b>

This alternative was evaluated against the three key criteria as follows:

- *Effectiveness* – High: Current and future dermal contact risks will be mitigated.
- *Implementability* – Low to Medium: The alternative will be logistically difficult and will require use of the adjoining site for material storage.
- *Cost* – Medium to high; However, costs are unpredictable and could end up much higher based on characterization results.
- *Impact of changing climate conditions* – Low: Increased intensity precipitation events will have limited impact on material that is generally at grade with no slopes. Increased temperature and summer droughts not likely to impact the efficacy of the alternative.

Assuming that characterization data results are favorable, partial waste removal and reusing portions of the soil mound onsite could be an effective alternative that could be implemented using readily available techniques and technologies. Human direct contact exposures to near-surface soil and waste material would be mitigated. The alternative is technically feasible; however, it would be logistically challenging and the resulting grade changes on the Site could impact redevelopability. In addition, the costs are unpredictable and could end up being very high.

### C. ALTERNATIVE 4 –WASTE REMOVAL AND INSTALLATION OF DERMAL BARRIER

The entire soil mound would be excavated and transported off-site for disposal at a licensed disposal facility. It is estimated that approximately 16,000 yards (22,400 tons) of material would be removed and disposed. Upon removal of the soil mound, a layer of clean fill material would be placed in the area of the former soil mound to create a dermal barrier to the impacted subsurface soil that remained. Because the dermal contact risk would be eliminated, no additional response actions would be needed to safely redevelop the Site.

The costs associated with Alternative 4 are summarized below:

RESPONSE ACTIVITY	UNIT COST	QUANTITY	COST
Secure site during response actions	\$5,000 lump sum	1	\$5,000
Excavation, transportation and disposal of waste material/fill/soil	\$28.50/ton	22,400	\$638,400
Waste characterization and monitoring	\$20,000 lump sum	1	\$20,000
Acquisition, transport, and placement of clean backfill	\$12/ton	2,000	\$24,000
<b>TOTAL</b>			<b>\$687,400</b>

This alternative was evaluated against the three key criteria as follows:

- *Effectiveness* – High: Current and future direct contact risks will be mitigated.
- *Implementability* – High: The Site is vacant and accessible allowing for this approach to proceed.
- *Cost* – High.
- *Impact of changing climate conditions* – Low: Increased intensity precipitation events will have limited impact on material that is generally at grade with no slopes. Increased temperature and summer droughts not likely to impact the efficacy of the alternative.

Waste removal and subsequent dermal contact barrier placement would be an effective alternative that could be implemented using readily available techniques and technologies. Human direct contact exposures to the soil mound would be eliminated. This alternative would allow the Site to be safely redeveloped and is more economically feasible and predictable than Alternative 3.

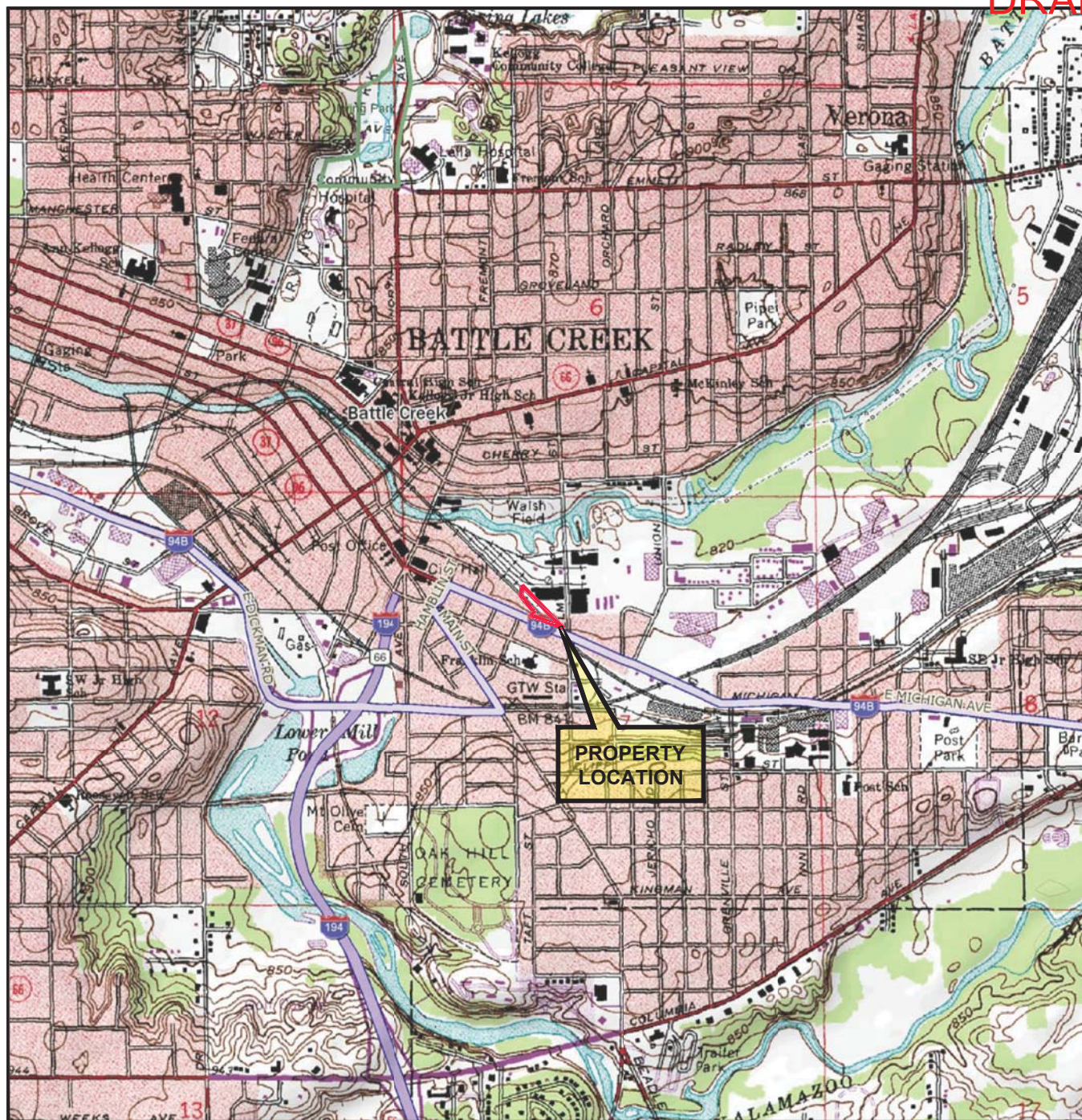
## 6.0 RECOMMENDED ALTERNATIVE

Alternative 4 is recommended for the Site because it is the evaluated alternative that will best achieve the project objectives and be economically feasible. Alternatives 1 and 2 were rejected because they would fail to meet the project objectives of preparing the Site for much needed redevelopment. Alternative 3 was rejected because it will be logistically challenging and the costs cannot accurately be predicted.

## FIGURES



DRAFT



Base map obtained from ©DeLorme Topo North America™ 10.



USGS QUADRANGLE(s) REFERENCED

BATTLE CREEK (MI) 1985



No.	Revision Date	Date	4-16-18
		Drawn By	JAB
		Designed By	DKO
		Scale	1" = 2000'

# **SITE LOCATION DIAGRAM** **161 EAST MICHIGAN AVENUE** **BATTLE CREEK, MICHIGAN**



**Figure No. 1**



Project

161 EAST MICHIGAN  
AVENUE

Project Location

BATTLE CREEK,  
MICHIGAN

Sheet Name

SITE FEATURES  
DIAGRAM

No.

Revision Date

Date

8-12-19

CADD

JAB

Designer

DKO

Scale

AS SHOWN

Figure No.

2

DATE: 08/12/2019  
SCALE: 1" = 100'  
NO REPRODUCTION SHALL BE MADE WITHOUT THE PRIOR  
WRITTEN CONSENT OF SME



LEGEND

--- APPROXIMATE SITE BOUNDARY

NOTE:  
BASE DRAWING INFORMATION TAKEN FROM GOOGLE  
EARTH PRO WITH IMAGE DATE 9-10-2017.

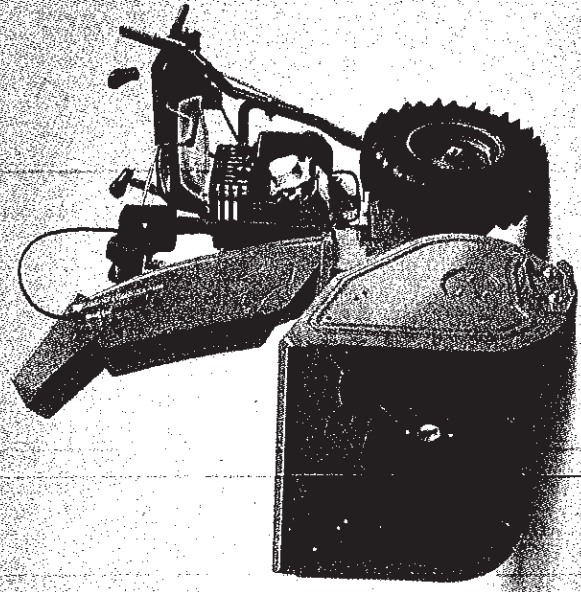


**CALHOUN COUNTY  
NOTICE OF PUBLIC HEARING**

Calhoun County will conduct a public hearing on November 21<sup>st</sup> at 7:00pm in the Board of Commissioners Council Chambers, 315 West Green Street, Marshall, MI for the purpose of affording citizens an opportunity to examine and submit comments on an EPA Cleanup Grant proposal.

Calhoun County is applying for funds to address soil conditions at 161 East Michigan Avenue, Battle Creek, MI. A copy of the Analysis of Brownfield Cleanup Alternatives (ABCA) and draft grant application are available for public review starting on November 15<sup>th</sup> in the Office of Community Development located on the ground floor of the County Administration Building, 315 West Green Street, Marshall, MI. Comments may be submitted in writing through the end of business, 5:00pm, on November 21<sup>st</sup> or made in person at the public hearing. Written comments should be mailed to the attention of Jennifer Bomba, Office of Community Development, 315 West Green Street, Marshall, MI 49068.

Calhoun County  
Jennifer Bomba, Community Development Director  
269-781-0784



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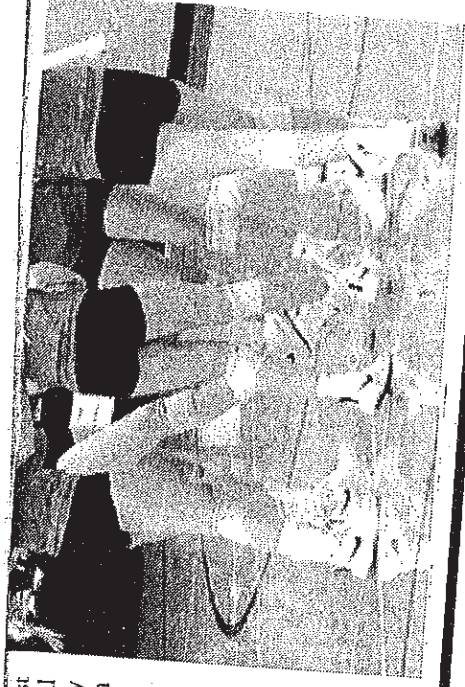
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**Continued next page**

St. Philip players celebrate a point during MHSAA Division 4 District competition last week. (Shopper News photo by Will Kowalski)

...sist title at Surgis last Thursday - was a Regional Semifinal this past Tuesday evening at Lakeview High against No. 3-ranked Mattawan.



## CALHOUN COUNTY NOTICE OF PUBLIC HEARING

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Calhoun County  
Jennifer Bomba, Community Development Director  
269-781-0784

**BOWLING, continued  
from page 35**

228, Beth Lepper 544-202, Kaylee Charfauros 210; Ballers 2730-1022, Carry Something 2713-969, Unsobert Friends 2706 Hit Squad 966. First Senior City Tournament, Bowlero Lanes.

Creek starting in January 2021 (a season from now).

• Dec. 7-8, Frank Andrew

Jan. 18, Feb. 1, 2020: Bath

From previous page

[illegible]

### CITIZEN PARTICIPATION PUBLIC HEARING CERTIFICATION

I, Shana Huerta, Deputy Clerk of the County Board of Commissioners, hereby certify that the following noted topics were discussed at the public hearing held at 7 pm, on Thursday November 21, 2019.

1. Application was available for review starting November 15, 2019.
2. Public attending the meeting were offered an opportunity to comment on the proposed project
3. No public comments were made during the public hearing.

*Shana Huerta*

Signature – Shana Huerta

*11/21/19*

Date

**ATTACHMENT 2**  
**LEVERAGING SUPPORT LETTERS**

# **BATTLE CREEK BROWNFIELD REDEVELOPMENT AUTHORITY**

4950 West Dickman Road, Suite 1 ♦ Battle Creek, Michigan 49037 ♦ Telephone 269.962.7526 ♦ Fax: 269.962.8096

November 12, 2019

Ms. Jennifer Bomba  
Community Development Director  
Calhoun County  
315 West Green Street  
Marshall, Michigan 49068

Re: FY 2020 U.S. EPA Brownfields  
Cleanup Grant Application  
Leveraging Support

Dear Ms. Bomba:

The Battle Creek Brownfield Redevelopment Authority (BCBRA) understands that Calhoun County is applying for a U.S. Environmental Protection Agency (EPA) Brownfields Cleanup Grant. As part of the grant application, the BCBRA understands that the County must leverage additional funds/resources to support the grant project. The BCBRA believes that the grant project will benefit the City of Battle Creek and the County as a whole and would like to offer its support for the project.

The BCBRA is committed to helping the County leverage funds received from the requested EPA Cleanup Grant. The BCBRA will work with the County to approve the inclusion of "The Mound" site (the Site) in the Battle Creek Brownfield Plan, which makes it eligible for tax increment financing of the excess costs of brownfield redevelopment. The following activities are eligible for tax increment financing: environmental assessment, cleanup planning, remediation and exposure mitigation, site preparation, and infrastructure improvement. The BCBRA herewith commits to support inclusion in the Brownfield Plan of the Site. This will allow capture of incremental taxes for up to 30 years to reimburse the costs of eligible activities taken to cleanup and redevelop the Site. The value of this funding for the project will depend on the value of the project, the amount of incremental taxes generated, and the amount of eligible costs. Based on the proposed redevelopment of the Site, it is anticipated that the value of this financial support for the Site could range from \$100,000 to \$500,000.

The BCBRA fully supports the County as it seeks a Cleanup Grant to bring the Site back into productive use and looks forward to using their programs and funds to support the redevelopment of this key gateway site in the City of Battle Creek.

Sincerely,



Shabaka Gibson  
Vice President





November 12, 2019

Ms. Jennifer Bomba  
Community Development Director  
Calhoun County  
315 West Green Street  
Marshall, Michigan 49068

Re: FY 2020 U.S. EPA Brownfields  
Cleanup Grant Application  
Leveraging Support

Battle Creek Unlimited and the Battle Creek Brownfield Authority support Shouldice's opportunity to grow their business in Battle Creek, MI. We understand that they are planning an expansion to add addition capacity, functionality, and jobs at their current site. To do this, they will need support to remove contamination on the adjacent mound property.

Battle Creek Unlimited (BCU) is prepared to support the project with an incentive totaling \$60,000 of leveraged funding. The Battle Creek Brownfield Authority is also prepared to support the project with \$40,000 of leveraged funding.

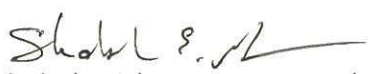
The BCU incentive assumes 30 new jobs will be created within three years of receiving the EPA grant. The incentive payout will be \$2,000 per job created and will sunset if not used by December 31, 2023 or the EPA grant is not secured.

This incentive package will require approval from the Battle Creek Unlimited Board of Directors and the Battle Creek Brownfield Authority.

Battle Creek Unlimited has over 40 years of experience managing Battle Creek's Fort Custer Industrial Park. We continually provide wrap around services for Battle Creek companies and find creative solutions to enhance their productivity.

We look forward to working with Shouldice Brothers and Calhoun County on this project. If we can provide any additional information, please do not hesitate to contact me.

Respectfully,

  
Shabaka Gibson, Vice President  
Battle Creek Unlimited

## Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☐ Preapplication  
☐ Application  
☒ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

12/03/2019

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

Calhoun County

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

**\* c. Organizational DUNS:**

0208880200000

**d. Address:**

**\* Street1:**

315 West Green Street

**Street2:**

**\* City:**

Marshall

**County/Parish:**

**\* State:**

MI: Michigan

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

49068-1518

**e. Organizational Unit:**

**Department Name:**

Community Development

**Division Name:**

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

**\* First Name:**

Jennifer

**Middle Name:**

**\* Last Name:**

Bomba

**Suffix:**

**Title:**

Community Development Directory

**Organizational Affiliation:**

Calhoun County

**\* Telephone Number:**

269-781-0817

**Fax Number:**

**\* Email:**

jbomba@calhouncountymi.gov

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Environmental Protection Agency

### 11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

### \* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-19-07

\* Title:

FY20 GUIDELINES FOR BROWNFIELD CLEANUP GRANTS

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

Calhoun County FY2020 Cleanup Grant Application

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="500,000.00"/>
* b. Applicant	<input type="text" value="100,000.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="600,000.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: \* Signature of Authorized Representative:  \* Date Signed: